



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

AUG 12 2001

CERTIFIED MAIL

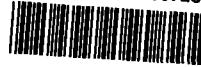
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

SR6J

Stan's Shell Station
Services Center
100 South Mill Street
Nashville Illinois 62263

EPA Region 5 Records Ctr.



381257

RE: The Ilada Waste Company, St.Clair County, Dupo, Illinois
General Notice of Potential Liability and Request for
Information

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced facility (Site), and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, 42 U.S.C. §9607(a), where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

To address the dangers and threats to human health and the environment as quickly as possible, U.S. EPA has conducted or is currently planning to conduct the following actions at the above-referenced Site.

1. A Preliminary Assessment (PA) and Site Investigation (SI) was conducted during 1995, in order to gain a basic understanding of any risks posed by releases or threatened releases from the site to human health and the environment.
2. A Remedial Investigation (RI) to identify the Site characteristics and to define the nature and extent of soil, air, surface water, and groundwater contamination at the Site and the risks posed by the Site.
3. A Feasibility Study (FS) to evaluate different cleanup options for the Site.
4. Remedial Design and Remedial Action (RD/RA) to design and implement the selected and EPA approved cleanup action for the Site.

For additional information regarding the policy and guidance associated with conducting RI/FS studies see OSWER Directive (9355.3-01) Guidance for Conducting Remedial Investigations and Feasibility Studies (RI/FS) Under CERCLA, October 1988.

U.S. EPA has received information that you may have owned or operated or generated or transported hazardous substances that were disposed of at the Site. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a Potentially Responsible Party (PRP), to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site. U.S. EPA is willing to discuss with you the entry of an appropriate administrative consent order under which you would perform or finance response activities and reimburse U.S. EPA for its costs. If a consent order cannot be promptly concluded, U.S. EPA may issue a unilateral order under Section 106 of CERCLA, requiring you to perform specified work. Under Sections 106 and 107 of CERCLA, you may be liable for reimbursement of U.S. EPA's costs, for statutory penalties, and for treble damages for noncompliance with such an order.

Enclosure 8 is a list of the names and addresses of other PRPs to whom this notification is being sent. Enclosure 9 is a list of PRPs who have previously received Special Notice Letters. This

list is provided to assist you in contacting other PRPs in this matter and to negotiate with U.S. EPA.

Enclosed is a U.S. EPA Small Business Regulatory Enforcement Fairness Act Information Sheet (Enclosure 7). The information sheet may be helpful, if you are subject to enforcement action by U.S. EPA and you are a qualified small business.

As a PRP, you should notify U.S. EPA in writing within ten (10) days of receipt of this letter of your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you do not wish to negotiate a resolution of your potential responsibility in connection with the Site and that you have declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

In addition, U.S. EPA is seeking to obtain certain other information from you pursuant to its authority under Section 104(e) of CERCLA, 42 U.S.C. §9604(e), for the purpose of enforcing CERCLA and to assist in determining the need for response to a release of hazardous substance(s) under CERCLA. The Administrator of the U.S. EPA has the authority to require any person who has or may have information relevant to any of the following to furnish U.S. EPA with such information:

- 1) the identification, nature, or quantity of materials which have been or are generated, treated, stored or disposed of at, or transported to, a facility;
- (2) the nature or extent of a release or threatened release of a hazardous substance, pollutant or contaminant at or from a facility; and

(3) the ability of a person to pay for or perform a cleanup. Enclosure 1 is a summary of the history of the Ilada Waste Company Site.

Pursuant to Section 104(e) of CERCLA, you are hereby requested to submit a response to this Information Request and its questions in Enclosure 2 concerning the Ilada Waste Company Site in St. Clair County, Dupu, Illinois. Instructions to guide you in the preparation of your response are in Enclosure 3. Definitions of the terms used in this Information Request and in the questions are in Enclosure 4.

This request is directed to your company, its officers, directors, and employees, and its subsidiaries, divisions, facilities and their officers, directors, and employees. The information sought herein must be sent to U.S. EPA within fourteen (14) calendar days of your receipt of this letter. Failure to respond fully and truthfully to this request, or to adequately justify any failure to respond, may result in an enforcement action against you by U.S. EPA under Section 104 of CERCLA, as amended.

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may request, however, that any such information be handled as confidential business information. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the U.S. EPA. Information claimed as confidential will be handled in accordance with the provisions of 40 C.F.R. Part 2. To request that the Agency treat your information as confidential, you must follow the procedures outlined in Enclosure 5, including the requirement that you support your claim for confidentiality.

The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all information contained therein is true and accurate to the best of the signatory's knowledge and belief. Moreover, any documents submitted to U.S. EPA pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief. Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, the signatory should so notify U.S. EPA. If any answer certified as

true should be found to be untrue, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001. The U.S. EPA has the authority to use the information requested herein in any administrative, civil or criminal action.

This information request is not subject to the approval requirements of the Paperwork Reduction Act, 44 U.S.C. section 3501 et seq.

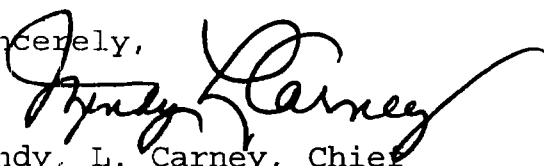
Send your responses to both the notice of potential liability within ten (10) days and the information requests within fourteen (14) days, to:

Marsha Adams
Enforcement Specialist (SR-6J)
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 W. Jackson
Chicago, IL 60604

If you have any legal questions, please call Nola Hicks, Assistant Regional Counsel, at (312) 886-7949. If you have technical questions about this Site, call Scott Hansen, Remedial Project Manager, at (312) 886-1999. Address all other questions to Marsha Adams, Enforcement Specialist, at (312)353-9484.

Due to the nature of the problem at this Site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frames specified. We trust you will give this matter your immediate attention.

Sincerely,



Wendy, L. Carney, Chief
Remedial Response Branch #1

Enclosures:

1. Site History
2. Questions
3. Instructions
4. Definitions
5. Confidential Business Information
6. Legal Authority
7. Small Business Notice
8. List of Potentially Responsible Parties (PRPs)
9. List of PRPs sent Special Notice Letter
10. Proof of liability with Manifests

ENCLOSURE 1

SITE HISTORY ELEMENTS

1. The Ilada Waste Company Site is located in a rural area in southwestern St. Clair County, approximately one mile south of Dupu, Illinois at 1143 M Station Road. The site consists of a three acre parcel of land situated on a wooded hillside.
2. The area surrounding the site is characterized by two distinct geologic settings. The western half lies in the Mississippi River flood plain. The flood plain consists of about 100 to 200 feet of alluvial deposits. These overlook bedrock of the Lower Mississippian System, composed predominantly of limestone with interbedded layers of shale. To the east of the site the land rises to form a ridge with elevations of 100 to 200 feet above the flood plain. It is highly weathered and exhibits distinct karst characteristics. Between 30 and 70 feet of clayey loess deposits over bedrock of the Middle and Upper Mississippian Systems. This bedrock consists predominantly of limestone with interbedded layers of shale and sandstone.
3. Population in the area is predominantly rural and agricultural. Private groundwater wells are used to supply drinking water to rural residents near the Site. Most area residents are served by municipal drinking water supplies obtained from the Mississippi River.
4. Crude oil has been produced on-site since 1939. During oil production, a mixture of crude oil and brine was pumped from two on-site wells into one of a number of gunbarrel tanks. The oil and brine were separated in the gunbarrel tanks. The oil was sold locally as fuel oil; the brine was stored in one of five brine lagoons or in several storage tanks. Waste brine was disposed of into a 3,000 foot deep injection well. Waste oil was accepted on-site from approximately 1979 to 1982 and stored in above ground storage tanks. Some unprocessed waste oil was sold locally for use in road dust control; the remainder was either disposed of in the brine injection well or processed onsite, blended with crude oil and sold for fuel. The waste oil was processed in an on-site still by heating to separate water and sludge from the

oil. The separated water was disposed of in the injection well; the sludge was either disposed of in the injection wells or sold for road dust control.

There is a high potential for groundwater contamination due to past activities at this site. Polychlorinated bi-phenyl (PCB) contamination has been identified in water from pits and soils on the site. Soils in this area have relatively low permeabilities, but their thickness is not great. The weathered condition of the soils and bedrock increases the potential for groundwater contamination.

5. The Preliminary Assessment/Site Inspection phase of the project is essentially complete. In the 1980s and 1990s, the U.S. EPA and Illinois EPA issued reports relating to the preliminary assessment and inspection of the site.
6. This Information Request is being sent so that U.S. EPA may identify PRPs (i.e., current or former owners, operators, generators, and/or transporters) associated with the Site that may perform the Remedial Investigation/Feasibility Study portion of the project.

ENCLOSURE 2

QUESTIONS

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Requests or who may be able to provide additional responsive documents, identify such persons.
4. List the EPA Identification Numbers of the Respondent.
5. Identify the acts or omissions of any person, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, (e.g., solid, liquid) and damages resulting therefrom.
6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of material at the Site.
7. Identify all persons, including yourself, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment, of waste materials, including hazardous substances, at the Site. In addition, identify the following:
 - A) The persons with whom you or such persons made such arrangements;
 - B) Every date on which such arrangements took place;
 - C) For each transaction, the nature or the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

- D) The owner of the waste materials or hazardous substances so accepted or transported;
- E) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- F) All tests, analyses, and analytical results concerning the waste materials;
- G) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- H) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- I) Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- J) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- K) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- L) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- M) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substance involved in each transaction;
- N) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were accepted for transport, and

subsequently until they were deposited at the Site, and all markings on such containers;

- O) The price paid for (i) transport, (ii) disposal, or (iii) both of each waste material and hazardous substance;
 - P) All documents containing information responsive to a-o above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
 - Q) All persons with knowledge, information, or documents responsive to a-p above.
8. Identify all liability insurance policies held by Respondent from 1939 to the present. In identifying such policies, state the name
- and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.
9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service for the period of operation.
10. If Respondent is/was a Corporation, respond to the following requests:
- 1. Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
 - 2. Provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service and Securities and Exchange Commission.
 - 3. Identify all of the Respondents' current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.

4. Identify the Parent Corporation and all Subsidiaries of the Respondent.
11. If Respondent is a Partnership, provide copies of the Partnership Agreement.
12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.
13. Identify (as defined in Enclosure 4) all persons who have knowledge or information about the shipment of any material, including but not limited to oil or oil mixed with any other material, directly or indirectly to the Site.
14. Identify (as defined in Enclosure 4) all persons who have knowledge or information about the shipment of any material containing or potentially containing polychlorinated biphenyls (PCBs) directly or indirectly to the Site.
15. Describe where you sent oil or oil mixed with any other material between 1979 and 1982. For each location, describe how much of each material you generated, transported, or arranged to be transported to the location and the dates of each shipment. In addition, for oil or oil-water mixtures sent directly or indirectly to the Site, identify (as defined in Enclosure 4) the information requested in paragraphs 7 a-p listed above.
16. Describe where you sent material containing or potentially containing PCBs between 1979 and 1982. For each location, describe how much of each material you generated, transported, or arranged to be transported to the location and the dates of each shipment. In addition, for material containing PCBs sent directly or indirectly to the Site, identify (as defined in Enclosure 4) the information requested in paragraphs 7 a-p listed above.
17. Identify (as defined in Enclosure 4) all persons who have knowledge or information about any material delivered to or any other transactions involving Jerry Russell Bliss; Jerry Russell Bliss, Inc.; or any other business that was associated with Jerry Russell Bliss.
18. Identify (as defined in Enclosure 4) all documents containing information on any transactions either directly

or indirectly involving Jerry Russell Bliss; Jerry Russell Bliss, Inc.; or any other business that was associated with Jerry Russell Bliss.

ENCLOSURE 3

INSTRUCTIONS

1. Answer each of the questions in this Information Request separately.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all persons and contributing sources of information.
4. Although the U.S. EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or misrepresentations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes the U.S. EPA to pursue penalties for failure to comply with that Section, or for failure to respond adequately to requests for submissions of required information.
5. In answering each question, identify all persons and contributing sources of information.
6. You must supplement your response to U.S. EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify U.S. EPA as soon as possible.
7. For any document submitted in response to a question, indicate the number of the question to which it responds.
8. You must respond to each question based upon all information and documents in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of source.
9. Your response must be accompanied by the following statement, or one that is substantially equivalent:

I certify under a penalty of law that this document and all Enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The individual who prepared the response or the responsible corporate official acting on behalf of the corporation must sign and date the statement, affidavit, or certification. Include the corporate official's full title.

10. If any of the requested documents have been transferred to others or have otherwise been disposed of, identify each document, the person to whom it was transferred, describe the circumstances surrounding the transfer or disposition, and state the date of the transfer or disposition.
11. All requested information must be provided notwithstanding its possible characterization as confidential information or trade secrets. If desired, you may assert a business confidentiality claim by means of the procedures described in Enclosure 5.

Enclosure 4

DEFINITIONS

1. As used in this letter, words in the singular also include the plural and words in the masculine gender also include the feminine and vice versa.
2. The term *person* as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. The Site referenced in these documents shall mean the Ilada Waste Company located in Dupon, Illinois.
4. The term *hazardous substance* shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term, *pollutant* or *contaminant*, shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.
6. The term *release* shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant.
7. The term *identify* means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
8. The term *identify* means, with respect to a corporation, partnership, businesses' trust or other association or

business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

9. The term *identify* means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
10. All terms not defined herein will have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R., Part 300 or 40 C.F.R., Part 260-280, in which case, the statutory or regulatory definitions will apply.

Enclosure 5

CONFIDENTIAL BUSINESS INFORMATION

You may consider some of the information confidential that the U.S. Environmental Protection Agency (U.S. EPA or Agency) is requesting. You cannot withhold information or records upon that basis. The Regulations at 40 C.F.R. Part 2, Section 200 *et seq* require that the U.S. EPA affords you the opportunity to substantiate your claim of confidentiality before the Agency makes a final determination on the confidentiality of the information.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. (See 41 Federal Register 36902 *et seq.* (September 1, 1976); 43 Federal Register 4000 *et seq.* (December 18, 1985).) If no such claim accompanies the information when the U.S. EPA receives it, the information may be made available to the public by the Agency without further notice to you. Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of Comprehensive Environmental Response Compensation Liability Act (CERCLA), because, as stated in Section 104(e)(7)(ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish the U.S. EPA to treat the information or record as "confidential", you must advise the U.S. EPA of that fact by following the procedures described below, including the requirement for supporting your claim of confidentiality. To assert a claim of confidentiality, you must specify which portions of the information or documents you consider confidential. Please identify the information or document that you consider confidential by page, paragraph, and sentence. You must make a separate assertion of confidentiality for each response and each document that you consider confidential. Submit the portion of the response that you consider confidential in a separate, sealed envelope. Mark the envelope "confidential," and identify the number of the question to which it is the response.

For each assertion of confidentiality, identify:

1. The period of time for which you request that the Agency consider the information confidential, e.g., until a specific date or until the occurrence of a specific event;
2. The measures that you have taken to guard against disclosure of the information to others;
3. The extent to which the information has already been disclosed to others and the precautions that you have taken to ensure that no further disclosure occurs;
4. Whether the U.S. EPA or other federal agency has made pertinent determination on the confidentiality of the information or document. If an agency has made such a determination, enclose a copy of that determination;
5. Whether disclosure of the information or document would be likely to result in substantial harmful effects to your competitive position. If you believe such harm would result from any disclosure, explain the nature of the harmful effects, why the harm should be viewed as substantial, and the causal relationship between disclosure and the harmful effect. Include a description of how a competitor would use the information;
6. Whether you assert that the information is voluntarily submitted as defined by 40 C.F.R. 2.201(I). If you make this assertion, explain how the disclosure would tend to lessen the ability of the U.S. EPA to obtain similar information in the future;
7. Any other information that you deem relevant to a determination of confidentiality.

Please note that pursuant to 40 C.F.R. 2.208(e), the burden of substantiating confidentiality rests with you. The U.S. EPA will give little or no weight to conclusory allegations. If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that the U.S. EPA may maintain their confidentiality

pursuant to 40 C.F.R. 2.205(c). If you do not identify this information and documents as "confidential," your comments will be available to the public without further notice to you.

ENCLOSURE 6

DESCRIPTION OF LEGAL AUTHORITY

The Federal Superfund law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9601, et seq. (commonly referred to as CERCLA or Superfund) gives U.S. EPA the authority to, among other things: 1) assess contaminated sites, 2) determine the threats to human health and the environment posed by each site, and, 3) clean up those sites.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. §9604 (e)(2), U.S. EPA has broad information gathering authority which allows U.S. EPA to require persons to furnish information or documents relating to:

- A. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility, or transported to a vessel or facility;
- B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility;
- C. The ability to pay the costs of the clean-up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA. This Section also authorizes an enforcement action with similar penalties if the recipient of the Request does not respond and does not justify the failure to respond. Other statutory provisions (18 U.S.C. §1001) authorize separate penalties if the responses contain false, fictitious or fraudulent statements. The U.S. EPA has the authority to use the information requested in this Information Request in an administrative, civil or criminal action.



U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements.

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers: <http://www.epa.gov/clearinghouse>

Pollution Prevention Clearinghouse
<http://www.epa.gov/opptintr/library/ppicindex.htm>

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs:
(800) 368-5888

Emergency Planning and Community Right-To-Know Act
(800) 424-9346

National Response Center (to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants Information
(800) 296-1996

Clean Air Technology Center
(919) 541-0800

Wetlands Helpline
(800) 832-7828

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Program
<http://www.epa.gov/ttn/sbap>

Office of Enforcement and Compliance Assurance
<http://www.epa.gov/compliance>

Compliance Assistance Home Page
<http://www.epa.gov/compliance/assistance>

Office of Regulatory Enforcement
<http://www.epa.gov/compliance/civil/index.html>

Office of Site Remediation Enforcement
<http://www.epa.gov/compliance/cleanup>

Innovative Programs for Environmental Performance
<http://www.epa.gov/partners>

Small Business Ombudsman
www.sba.gov/ombudsman



Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed through the Center's gateway at <http://www.assistancecenters.net> or by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/agriculture)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

Three new centers are under development for the auto salvage sector, the construction industry, and U.S. Mexican border waste issues.

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/compliance/incentives/auditing>) and the Small Business Policy (<http://www.epa.gov/compliance/incentives/smallbusiness>).

These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community because the regulated community previously commented on its activities.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

ENCLOSURE 8

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

- | | | |
|----|---|-------------|
| 1. | Aamco Transmission
3200 Clark LN
Columbia, Missouri 65202 | 370 gals |
| 2. | Albert Buick Honda GMC Truck
1717 N. Providence Road
Columbia, Missouri 65202 | 200 gals |
| 3. | Boone County Public Works
5551 Highway 63 South
Columbia, Missouri 65201 | 300 gals |
| 4. | Clean Harbor Environmental Services
1 Mobile Drive
Sauget, Illinois 62201 | 19,568 gals |
| 5. | Doe Run Company
Sweetwater Unit
Ellington, Missouri 65203 | 28,500 gals |
| 6. | Edwin Cooper, Inc.
Monsanto Drive
Sauget, Illinois 62002 | 1,200 gals |
| 7. | Galemore Motor Company
1010 East Marshall Street
Charleston, Missouri 63834 | 500 gals |
| 8. | Hoods
4709 Paris Road
Columbia, Missouri 65202 | 200 gals |
| 9. | Jiffy Lube
2107 West Worley Street
Columbia, Missouri 65203 | 900 gals |

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

- | | | |
|-----|--|------------|
| 10. | Jim Trenary Chevrolet
600 Main Street
Troy, Missouri 63379 | 320 gals |
| | | |
| 11. | Joe Machen's Ford, Inc.
1911 West Worley Street
Columbia, Missouri 65203 | 225 gals |
| | | |
| 12. | K-Mart Stores
237 Arnold Crossroads Center
Arnold, Missouri 63010 | 600 gals |
| | | |
| 13. | McBride Mack Sales
Route 13
East Carbondale, Illinois 62901 | 500 gals |
| | | |
| 14. | Mr. G's Tire & Auto
803 Business Loop 70
Columbia, Missouri 65203 | 400 gals |
| | | |
| 15. | Panhandle Eastern Pipeline Company
100 SW State Route 131
Holden, Missouri 64040 | 2,850 gals |

And

Panhandle Eastern Pipeline Company
16151 N Route Z
Centralia, Missouri 65240

Panhandle Eastern Pipeline Company
16076 Highway T
Houstonia, Missouri 65333

- | | | |
|-----|--|----------|
| 16. | Perry Chevrolet, Inc.
1 Business Loop 70 East
Columbia, Missouri 65203 | 135 gals |
|-----|--|----------|

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

17.	Rogers Cartage Company 2900 Fallings Springs Road East St. Louis, Illinois 62206	400 gals
18.	Rollins Truck Rental-Leasing 2629 Chouteau Avenue St. Louis, Missouri 63103	400 gals
19.	Roton Products, Inc. 660 East Elliot Avenue St. Louis, Missouri 63122	660 gals
20.	Ryder System Inc. Mr. Greg Swienton, President 280 NW 175 th Street Miami, Florida 33169	460 gals
21.	Sears 2201 West Worley Street Columbia, Missouri 65203	150 gals
22.	Skyline Motors 2972 S. Service Road East Foristell, Missouri 63347	230 gals
23.	University Chrysler 1200 I 70 Drive South West Columbia, Missouri 65203	300 gals
24.	Valley Ford 675 Dunn Road Hazelwood, Missouri 63042	300 gals
25.	Wildwood Shell Service 14804 Clayton Road Chesterfield, Missouri 63017	350 gals
26.	Ace Manufacturing 300 Ramsey Drive Sullivan, Missouri 63080	250 gals

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

27.	Cape Girardeau Department of Public Works 1625 North Kingshighway Cape Girardeau, Missouri 63703	200 gals
28.	Duke's Oil Service, Inc. 783 Fairway Drive Bensenville, Illinois 60106	42,100 gals
29.	Famous Barr South Kings Highway St. Louis, Missouri 63129	200 gals
30.	Purcell Tire Company 2155 Williams Street Cape Girardeau, Missouri 63703	125 gals
31.	K-Mart 237 Arnold Crossroads Center Arnold, Missouri 63010	320 gals
And		
	K-Mart 4023 South Nolan Road Independence, Missouri	320 gals
32.	Erb Equipment Highway 74 & West End Boulevard Cape Girardeau, Missouri 63703	400 gals
33.	Mike Kehoe Ford 807 Southwest Boulevard Jefferson City, Missouri 65109	200 gals
34.	Ewers Tire & Service 214 East Promenade Street Mexico, Missouri 65265	210 gals

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

35.	LeGrand's Automatic Transmissions 1237 North Water Street Cape Girardeau, Missouri 63701	150 gals
36.	Missouri State Highway Patrol 1510 East Elm Street Jefferson City, Missouri 65101	300 gals
37.	Target 12275 S. Charles Rock St. Louis, Missouri 63044	125 gals
38.	University of Missouri @ Rolla 113 University Center West Rolla, Missouri 65409	200 gals
39.	Zephyr Valley Park, Missouri	200 gals
40.	Capital Mercury 814 Southwest Boulevard Jefferson City, Missouri 65109	200 gals
41.	Pat Kelly Equipment 2300 South Hanley Road St. Louis, Missouri 63144	200 gals
42.	U. S. Army Fort Leonard Wood Missouri Defense Property Disposal Office Fort Leonard Wood, Missouri 65473	5,400 gals
43.	Army Environmental Law Division 901 N. Stuart Street Suite 400 Arlington, Virginia 22203-1837 Attention: Mike Lewis	
44.	Waterloo Motors, Inc. 100 South Market Street Waterloo, Illinois 62298	300 gals

**ILADA WASTE COMPANY
PRP'S RECEIVING GENERAL NOTICE LETTER
110 GALLONS OR MORE**

45. United Parcel Service
520 South Jefferson Avenue
St. Louis, Missouri 63103

1,786 gals

And

United Parcel Service
Columbia, Missouri 65201

Enclosure 9

**PARTIES SENT SPECIAL NOTICE LETTER
DATED JUNE 10, 2003**

Emerson Electric Company
Mr. Harley M. Smith
Assistant General Counsel & Assistant Secretary
8000 W. Florrissant Avenue, PO Box 4100
St. Louis, MO 63136-8506

Contact for Emerson:

Jeffrey Knight, Attorney
Shaw Pittman LLP
2300 N. Street, NW
Washington, DC 20037-1128

Russell M. Bliss
c/o Bliss Waste Oil Company
21699 County Road 3644
St. James, MO 65599

Charles R. Larson, President
Larson Industries
1309 Old Cement Hollow Road
East Carondelet, IL 62240

Shell Oil
c/o Equilon Enterprises
1100 Louisiana St.
Houston, TX 77002

Contact for Shell:

Thomas W. Kearns, Senior Counsel
Shell Oil Company Legal Services-US
1 Shell Plaza
P.O. Box 2463
Houston, TX 77252-2463